



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**MEMORANDUM**

**FROM:** Deanna Scher, Chemical Review Manager  
Reregistration Branch I  
Special Review and Reregistration Division (7508C)

**TO:** OPP Public Docket

**SUBJECT:** Meeting with BASF to Discuss Post-application Risk Assessment

The following document summarizes the meeting held on 03/22/00 between EPA staff and BASF to discuss the vinclozolin post-application risk assessment. This meeting took place prior to the opening of the public docket.

BASF presented their position on the methods used by the Agency to calculate dislodgeable foliar residue (DFR) and turf transferable residue (TTR) levels and presented revised MOE values based on alternative methods.

In general, the Agency used an exponential decline curve to calculate residue levels as outlined in current Agency guidance. BASF disagreed with the Agency's approach and applied a more sophisticated curve fitting technique to the data.

No decisions were made at the meeting. BASF was asked to submit their re-evaluation of EPA-calculated DFRs for review by an Agency statistician and the occupational risk assessor. Any changes to the post-application risk assessment will be noted in the risk assessment and/or overview document which will be released for public comment.